

# **SAFEGUARDING POLICY**

## **FOR KNIGHTS TRAINING ACADEMY**



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## 1. Introduction

Knights Training Academy (KTA) is committed to safeguarding and promoting the welfare of children and young people. We believe that all children have the right to be protected from harm and that it is everyone’s responsibility to ensure that this happens. Safeguarding is an essential element in an education setting and we aim to promote a positive culture where learners are able to learn and develop. We recognise we have a duty of care to students, staff and stakeholders. KTA endeavours to ensure their wellbeing and health and safety are a priority at all times.

### 1. Scope

This policy applies to all staff, employers, governors, volunteers, and visitors of KTA.

### 2. Definitions

Safeguarding is defined as the process of protecting children and young people from abuse or neglect and ensuring that they grow up in a safe and caring environment.

**Student/Learner**– the term “student” or “learner” for this policy covers students/learners of the Academy who are Apprentices and Work Based Learning students. In addition, it covers students/Learners visiting the Academy.

**Child** – in accordance with The Children Act 1989, and therefore in accordance with law, KTA shall regard any young person below the age of 18 as a child.

**Vulnerable Adult** – if a person aged 18 or over who may be in need of community care services by reason of mental or other disability, age or illness and who is, or may be unable to take care of himself or herself, or unable to protect himself or herself against significant harm or serious exploitation. Vulnerability can apply to a wide range of disabilities and situations including those adults at risk owing to their caring role or family responsibilities, the old and frail. It can include those who are vulnerable due to other circumstances such as being an asylum seeker. In addition, it can include those under a probation order or those who may be experiencing problems due to alcohol or drugs

### 3. The Safeguarding Committee

The Safeguarding Committee will oversee all aspects of Safeguarding within KTA. The Safeguarding Committee has been established to promote a safe and inclusive environment for all staff and learners. Our primary focus is to identify and address any potential risks to the safety and well-being of vulnerable individuals, including children and adults at risk. We aim to achieve this by developing and implementing policies and procedures that are in line with current best practices and legal requirements. We will do this by.

- A committee meeting will be held at a minimum of 3 times per year to review developments and monitor activities
- Include a cross-section of relevant KTA staff, to ensure all aspects of KTA life are considered

- Develop and implement an action plan to ensure there is an inclusive KTA approach to Safeguarding
- Update and review the Safeguarding Policy and Procedures annually

Safeguarding Committee members are:

Chloe Nancarrow- [Chloe@knightsltd.co.uk](mailto:Chloe@knightsltd.co.uk) (Safeguarding Lead)

Ellie Mortimer – [ellie@knightsltd.co.uk](mailto:ellie@knightsltd.co.uk)

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#### **4. Roles and Responsibilities**

The designated safeguarding lead is responsible for ensuring that KTA's safeguarding policy is implemented effectively and that all staff, employers, governors, and volunteers are aware of their roles and responsibilities. All staff have a responsibility to report any safeguarding concerns to the designated safeguarding lead or any member of the committee.

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KTA recognises that apprentices aged 16–17 are children in law and may spend a significant proportion of their programme in the workplace rather than on KTA premises. Safeguarding arrangements for this group are therefore adapted to reflect their employment status, off-site delivery and increased reliance on employer-based supervision. This includes employer safeguarding checks, workplace due diligence, regular welfare monitoring through progress reviews, clear safeguarding reporting routes, and liaison with parents/carers and external agencies where appropriate.

#### **5. Reporting Procedure**

Safeguarding reporting procedures are put in place to ensure that any concerns or suspicions about the welfare or safety of vulnerable individuals are promptly reported and appropriately addressed. These procedures are essential in preventing harm and ensuring that those who are at risk receive the necessary support and protection.

The specific safeguarding reporting procedure involves the following steps:

1. Recognise and respond to concerns: The first step is to recognise any signs or indicators of abuse or neglect and respond to them appropriately. This might involve listening to someone

who raises concerns, observing changes in behaviour or physical appearance, or noticing unexplained injuries or bruises.

2. Record and report the concern: Once a concern has been identified, it should be reported to the appropriate person (The designated safeguarding lead or any committee member) who will then record it accordingly. If a social worker or the police are involved you will also need to notify them of any new concerns.
3. Follow-up and support: After a concern has been reported, it is important to follow up on it and provide appropriate support to the individual at risk.

This includes concerns that arise in the workplace for apprentices aged 16–17, including concerns about employer staff, other employees, customers, or unsafe working practices.

## **6. Response Procedures**

Any member of staff who has knowledge of, or suspicion that, a child is or has been suffering significant harm must refer their concern to a designated member of staff as soon as possible but within 24 hours at the latest. They must also pass any written notes to the safeguarding lead and not retain any written information. All allegations or suspicions must be taken seriously. The student must be advised that this information cannot be kept confidential and will be passed on to the designated member of staff in KTA in the first instance. The designated officer who receives the allegation or disclosure of abuse should make an immediate written record of the conversation, including the following information:

- date and time of report
- your name and name of the complainant
- name and DOB of child alleged to have been abused
- nature of alleged abuse
- description of any injuries observed, if any
- any other information is given, including siblings if relevant (their full names and DOB if possible)
- confirmation that the student has been advised of the next steps
- Summary of the concern, details of how the concern was followed up and resolved, notes of any action taken, decisions reached and the outcome.

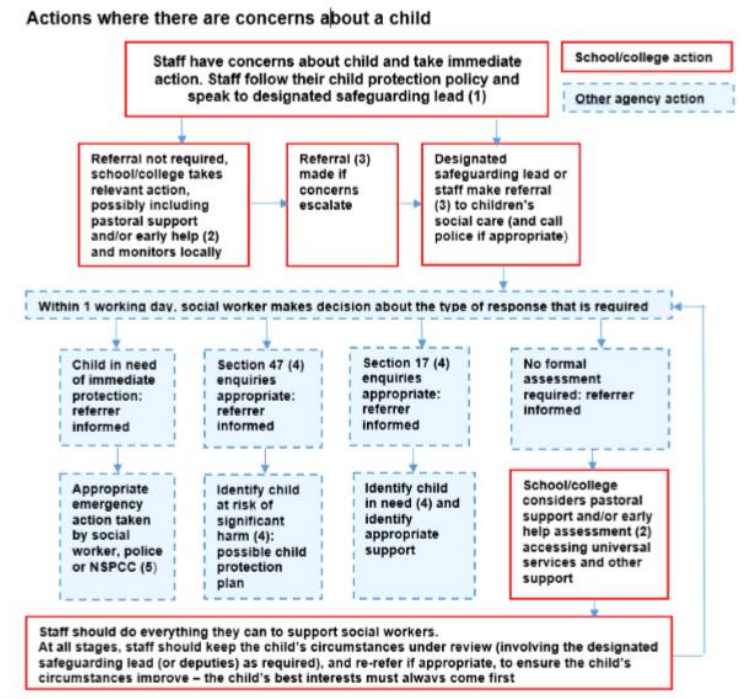
This information will be recorded on our internally allocated database. The reporting email/telephone call will also be stored in the same location and be made available for access.

KTA will follow the procedures set out in the local safeguarding children board's guidance. This may involve contacting social services or the police.

**Questions should be kept to the minimum required for clarity, and leading questions must be avoided.**

If uncertain about any situation, advice (which should be recorded) should be sought from relevant organisations, for example from Police, Children's Services, Adult Care Services etc.

If abuse is suspected but not disclosed, it may be appropriate to remind the student about the availability of the NHS Counselling Service or external helplines.



KTA's designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required.
- support staff who make referrals to local authority children's social care.
- refer cases to the Channel programme where there is a radicalisation concern as required.
- support staff who make referrals to the Channel programme

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

KTA endeavours to conclude safeguarding cases within a maximum period of three months. Should a case remain unresolved after this timeframe, it may be transitioned to our welfare register for ongoing monitoring.

## 7. Confidentiality & Information Sharing

Advice for practitioners providing safeguarding services to children, young people, parents and carers support staff who must make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a member of the committee. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

All staff have a responsibility to maintain confidentiality, but this must be balanced against the need to share information in order to safeguard children. Information will only be shared on a need-to-know basis.

A good working relationship between staff and students depends to a large extent on the establishment of trust. This may be described as a “confidential relationship”. However, guarantees of absolute confidentiality should not be given. If a student discloses abuse to a member of staff, it is important that the boundaries of confidentiality and the need to pass on that information are explained to the student. It is often easier to explain to the student that you have a responsibility to pass on information on certain matters than to get into a situation where you break a confidence. The DSL will ensure that any safeguarding concern will follow the student should they move to another school/college.

## **8. Early Help**

If early help is appropriate, KTA’s designated safeguarding lead (or committee) will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children’s social care for assessment for statutory services if the child’s situation does not appear to be improving or is getting worse.

## **9. Statutory assessments**

Where a child is suffering or is likely to suffer from harm, it is important that a referral to children’s social care (and if appropriate the police) is made immediately. Referrals will follow the local referral process. Being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation

Children suffering or likely to suffer significant harm should be referred to external sources. Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child’s welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

The online tool <https://www.gov.uk/report-child-abuse-to-local-council> directs to the relevant local children’s social care contact number.

If, after a referral, the child’s situation does not appear to be improving, the referrer will consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child’s situation improves.

## **10. Defining concerns**

**Child abuse** - may be physical, sexual or emotional abuse or neglect

**Significant harm** – ill-treatment or the impairment of health or development (compared with the health or development which might be expected of a similar child)

**Physical abuse** - actual or likely physical injury to a child, or failure to prevent injury. May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing

physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a child they are looking after.

**Sexual abuse** - actual or likely sexual exploitation of a child, including prostitution. Involving forcing or enticing a child or young person to take part in sexual activities whether or not a child is aware of what is happening. The activities may involve physical contact including penetration or non-penetrative acts. For example it may also include involving the child looking at or being involved in the production of, pornographic material or watching sexual activities, or encouraging the child to behave in sexually inappropriate ways. This can include grooming a child in preparation for abuse.

**Emotional abuse** - emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to the child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Age or developmentally inappropriate expectations being imposed on children, causing children frequently to feel frightened, or the exploitation or corruption of children will also constitute emotional abuse. This may also include overprotection and limitation of exploration and learning or participating in normal social interaction. It can include seeing or hearing ill treatment of another person. It may include serious bullying, including cyber-bullying. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate.

**Neglect** - neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development such as failing to provide adequate food, shelter and clothing, medical care or treatment or neglect of, or unresponsiveness to, a child's basic emotional/physical needs. It can include not protecting a child from emotional harm or danger.

**Risk to self and/or others** – This may include but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others, which may or may not include children. This may be a consequence of an individual experiencing a significant level of personal, and emotional trauma and/or stress.

**Domestic Violence** – can be physical, emotional, sexual, or neglect. This category also covers Forced Marriages and honour-based violence. This can affect children as being a victim in their own right and therefore will need support to keep them safe in the educational setting.

**ACE** – adverse childhood experiences

**Child criminal exploitation: county lines** – Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>102</sup> should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years.
- can affect any vulnerable adult over the age of 18 years.
- can still be exploitation even if the activity appears consensual.
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females, and young people or adults; and

- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.
- Children are also increasingly being targeted and recruited online using social media.
- Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

**Homelessness** – Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. KTA’s designated safeguarding lead should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children’s social care where a child has been harmed or is at risk of harm.

In most cases, school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children’s Services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child’s circumstances.

**Slavery and Human Trafficking-** Slavery and human trafficking are both serious human rights abuses that involve the exploitation of individuals for personal or commercial gain.

Slavery refers to the practice of forcibly controlling and exploiting a person, treating them as property, and denying them the right to leave or refuse work. Slavery can take many forms, including forced labour, debt bondage, and forced marriage.

Human trafficking, on the other hand, refers to the recruitment, transportation, transfer, harbouring or receipt of a person by means of force, fraud or coercion, for the purpose of exploitation. Exploitation can take many forms, including forced labour, sexual exploitation, and forced criminal activities.

Both slavery and human trafficking involve the abuse of vulnerable people who are often forced into situations where they have little or no control over their lives.

KTA are committed to ensuring that slavery and human trafficking are not taking place in any part of our business. We will continue to review our policies and procedures to ensure that they remain effective in preventing modern slavery and human trafficking.

### **Welfare/Well-being Register**

A welfare register is maintained for individuals who have been identified as a concern but do not pose a safeguarding risk. These learners will be monitored until there is no longer a cause for concern, at which point they will be moved to the closed cases section of our internal database.

## 11. Safeguarding Learners aged 18+

**Definitions of 'vulnerable adult'** - A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or exploitation. People who fall into the vulnerable category include those with learning disabilities or mental health problems. Adults may also be classed as being vulnerable if their situation is complicated by additional factors such as:

- Physical frailty
- Chronic illness
- Sensory impairment
- Challenging behaviour
- Social problems
- Emotional problems
- Poverty
- Homelessness
- Substance misuse
- Age-related frailty
- Victim of domestic abuse

Vulnerable adults enrolling on courses at KTA may have a named advocate who should be identified at the interview stage.

### Definitions of abuse against vulnerable adults

**Physical abuse** - includes hitting, slapping, pushing, kicking, rough handling or unnecessary physical force, either deliberate or unintentional, misuse of medication, restraint or inappropriate sanctions.

**Sexual abuse** - includes rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent to, or was pressured into consenting to. Sexual abuse can occur between people of the same sex and it can also occur within a marriage or any long-term relationship.

**Psychological abuse** - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, silent bullying/isolation or racist bullying.

**Financial or material abuse** - includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

**Neglect and acts of omission** - includes ignoring or withholding medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, clothing and heating.

**Discriminatory abuse** - includes racist, sexist, or discrimination based on a person's disability.

**Self-neglect** - is not a direct form of abuse but staff need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

**Stalking** - continued unwanted attention through personal contact (directly with you through your friends and family) telephone calls letters, emails, text messages and Internet chat rooms

**Cyber Bullying** - All areas of the internet, such as email, social media or internet chat room misuse, misuse of associated technology – e.g. camera and video facilities, happy slapping – the practice whereby a group of people assault a stranger at random while filming the incident on a mobile device, to circulate the images or post them online.

**Sexual harassment** - Sexual harassment is behaviour of a sexual nature that is unwanted. Sexual harassment must be either have violated a person's dignity and/or created a hostile environment for them. This could include flirting, gesturing or making sexual remarks about someone's body, clothing or appearance, asking questions about someone's sex life, telling sexually offensive jokes, making sexual comments or jokes about someone's sexual orientation or gender reassignment, displaying or sharing pornographic or sexual images, or other sexual content, touching someone against their will, for example hugging them or sexual assault or rape.

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of this guidance.

**Serious violence** - There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

**Child on child abuse**- is any form of physical, sexual, emotional, and financial abuse, and forced control, between children, and within children's relationships (both intimate and nonintimate), friendships and wider peer associations. It can take many forms, including, serious bullying (including cyberbullying), relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or prejudice-based violence including, but not limited to, gender-based violence. It may also include banter and physical behaviour such as bra

flicking or up skirting. Online peer-on-peer abuse would include sexting, online abuse, peer-on-peer grooming, the distribution of youth-involved sexualised content, and harassment.

**Sexual Violence-** Sexual violence' means any sexual activity or act that happened without consent. It includes rape, sexual assault, sexual abuse and sexual harassment. Sexual violence is any kind of sexual activity or act (including online) that was unwanted or involves one or more of the following: pressure, manipulation, bullying, intimidation, threats, deception, or force.

Some important things to remember about sexual violence are:

- It does not have to leave a person with visible injuries.
- It does not have to involve other physical violence or weapons.
- If the victim or survivor didn't scream, try to run away or fight then that doesn't mean it wasn't sexual violence. It's really common for people who experience sexual violence to find themselves unable to move or speak.
- Sexual violence can be perpetrated by a stranger but it is very often perpetrated by someone that the person knows or even trusts. For example, a friend, colleague, family member, partner or ex-partner.
- Orgasming or experiencing feelings of arousal during sexual violence doesn't mean it wasn't sexual violence.
- A victim or survivor of sexual violence was never 'asking for it'. It doesn't matter what they were wearing or what consensual sexual activity or other interactions happened before the sexual violence.

### **Contextual Safeguarding**

A contextual safeguarding approach is about changing the way that any staff who are involved in child protection think about the way they approach a problem, especially when risks occur outside of the family. It needs all those within a Safeguarding Partnership to reflect on how they work together, instead of just referring into social care. An approach like this can then ensure a safe space is created for children rather than exposing them to potential peer-on-peer abuse.

### **What to do if you suspect a vulnerable adult is being abused**

Any member of staff who has knowledge of, or suspicion that, a vulnerable adult student is or has been suffering abuse must refer their concern to the Safeguarding Officers as soon as possible by telephone then followed up using the staff referral form (see Appendix 1). All allegations or suspicions must be taken seriously. The student must be advised that this information cannot be kept confidential and will be passed on to the Safeguarding Committee at KTA in the first instance.

## **12. Safeguarding Children and Young Adults with Special Educational Needs (SEN)**

Safeguarding those with special educational needs (SEN) is a crucial aspect of any educational setting's safeguarding policy.

KTA is committed to safeguarding and promoting the welfare of all our learners, including those with special educational needs (SEN). We recognise that children with SEN may be particularly vulnerable to harm or abuse and we are committed to taking all necessary steps to ensure their safety and well-being.

For the purposes of this policy, special educational needs (SEN) include children who have a learning difficulty or disability that requires special educational provision. This includes children who have a

physical, sensory, or intellectual disability, or who have a mental health condition that affects their ability to learn.

KTA will ensure that all learners with SEN are identified and assessed as early as possible. We will work closely with parents/carers and other professionals to ensure that pupils receive the appropriate support and interventions to meet their needs. This includes making reasonable adjustments to ensure that learners with SEN can access the curriculum and participate fully in the programme.

Where learners with SEN are identified as being at risk of harm or abuse, KTA will conduct a thorough risk assessment and put in place appropriate support and interventions to safeguard their well-being. This may include working with external agencies such as social services or healthcare providers.

All staff will receive regular training in safeguarding, including specific training on safeguarding children with SEN. This will ensure that staff are able to identify and respond appropriately to concerns and that they understand their responsibilities towards learners with SEN.

KTA will ensure that parents/carers are informed of KTA's safeguarding policies and procedures, including how to report any concerns they may have. Information sharing will be handled sensitively and in accordance with relevant legislation.

KTA recognise the particular vulnerability of children with SEN and will take all necessary steps to safeguard their welfare and protect them from harm or abuse.

### **13. Inclusion and Identification of Additional or Hidden Vulnerabilities**

The organisation recognises that some learners may have additional or increased safeguarding needs arising from previous experiences, including care experience, involvement with the justice system, or other adverse circumstances. Learners are not required to disclose such information, and the organisation does not rely on disclosure alone to identify safeguarding risk.

Safeguarding arrangements are designed to identify and respond to **current need and risk**, regardless of whether a learner's background is known. Hidden vulnerabilities may present through indicators such as changes in behaviour, disengagement, emotional distress, attendance concerns, or difficulty accessing support, and may increase safeguarding or pastoral needs.

Opportunities for learners to share information about support needs are provided through induction, enrolment, and ongoing engagement, on a voluntary and confidential basis. Any information shared is used solely to support learner wellbeing and safety and is handled in line with data protection requirements.

All staff are trained to recognise signs that a learner may require additional safeguarding or support and to respond appropriately by following safeguarding procedures. Staff must not seek to establish or speculate about a learner's personal history but must refer concerns to the Designated Safeguarding Lead, who will assess risk and coordinate appropriate support.

Where additional needs are identified, proportionate actions will be taken to reduce risk and promote inclusion. This may include reasonable adjustments, pastoral or mentoring support, development of individual support or risk management plans, and, where lawful and appropriate, liaison with external agencies. Information will be shared internally only on a need-to-know basis, and the limits of confidentiality will be made clear to learners.

This approach ensures that safeguarding responsibilities are met in an inclusive and lawful manner, while respecting learners' rights to privacy, dignity, and equal access to support.

## **14. Recruitment and Selection**

All staff and volunteers are subject to appropriate checks and vetting procedures before they are allowed to work with children. These include enhanced Disclosure and Barring Service (DBS) checks, references, and a formal interview process.

### **14.1 Safe Recruitment of Staff**

A policy has been approved by senior management that sets out guidelines for DBS requirements. Where an enhanced DBS disclosure is not available prior to commencement of employment by KTA, in exceptional circumstances, the Managing Director can agree a start date.

All teaching staff will have a Prohibition check completed to ensure no delivery staff are engaged who have been barred from teaching.

All staff involved in the interview process must complete safer recruitment training.

All staff must receive training about online safety as part of an induction.

All staff to have had a social media screening completed prior to second interview.

Please see further guidance on Safer Recruitment in the document below (Part 3).

[Keeping children safe in education - GOV.UK](https://www.gov.uk/keeping-children-safe-in-education)

### **14.2 Employer Requirement**

Where an apprentice is aged 16–17, KTA recognises that the learner remains a child in law and must be safeguarded accordingly, even where they are employed. Before an apprentice aged 16–17 is placed or starts in the workplace, KTA will ensure that appropriate employer checks and due diligence are completed. This includes confirmation of appropriate safeguarding arrangements, suitable supervision, appropriate staff conduct and, where required, Disclosure and Barring Service (DBS) checks for relevant workplace staff.

Employers must be made aware of their safeguarding responsibilities for under-18 apprentices and must know how to report concerns to KTA. This includes concerns relating to the apprentice's safety, welfare, behaviour, mental health, risk of exploitation, radicalisation, bullying, harassment, inappropriate staff conduct or any other safeguarding matter.

KTA will ensure that employer safeguarding expectations are communicated prior to placement or enrolment and reinforced through ongoing employer engagement and apprenticeship reviews.

### **14.3 Work Based Learning**

The Academy will hold Safeguarding Policies and details of designated persons for all subcontractors.

All learners on Work Based Learning programmes receive an induction, which includes raising awareness of the Academy's commitment towards Safeguarding, details of the support services offered and contact details for the Safeguarding Officers. The understanding of all aspects of Safeguarding and safe working practices is checked at each review and the opportunity to discuss any issues is given. In accordance with this Policy. Assessments are made to ensure that the learners wellbeing is safeguarded by the work placement team. The Academy has arrangements in place to ensure that, prior to work related work commencing:

- Pre-placement Health and Safety checks of employer's premises and health and safety management arrangements are complete, including insurance details
- Consents (parental / guardian / learners) are obtained
- Employers are made aware of relevant Academy policies
- The requirements for ISA / DBS checks are assessed and the relevant processes undertaken where required

Any member of staff who has been dismissed due to Safeguarding allegations will be reported via the Teaching Regulations Agency ([www.gov.uk](http://www.gov.uk))

For learners aged 16–17 on work-based learning or apprenticeship programmes, safeguarding arrangements will be adapted to reflect the fact that learning takes place primarily in the workplace. In addition to pre-placement checks, KTA will monitor the learner's welfare, wellbeing and safety through regular progress reviews, contact with the learner and employer, and clear safeguarding escalation routes. Any concerns relating to the workplace, employer staff, inappropriate behaviour, peer interactions, unsafe practice or wider learner vulnerability will be treated as safeguarding concerns and responded to in line with this policy.

#### **14.4 Safeguarding Arrangements for Apprentices Aged 16–17**

KTA recognises that apprentices aged 16–17 are children in law and may be more vulnerable due to their age, employment status, time spent off-site and reduced day-to-day contact with KTA staff. Safeguarding arrangements for this group are therefore adapted to ensure that their welfare remains under active oversight throughout the programme.

These arrangements include:

- confirmation that the employer understands its safeguarding responsibilities for under-18 apprentices
- appropriate workplace due diligence, including health and safety and safeguarding considerations before learning begins
- assessment of whether relevant workplace staff require DBS clearance and confirmation that this has been completed where required
- clear communication to the apprentice about how to report any safeguarding or welfare concern, including concerns about the workplace, employer staff, other employees, customers, or peers
- regular progress reviews that include discussion of wellbeing, welfare, safety, conduct, attendance, behaviour and any concerns arising in the workplace or outside work
- clear escalation routes to KTA's Designated Safeguarding Lead where concerns arise
- appropriate liaison with parents/carers, external agencies and other professionals where this is necessary to safeguard the learner and in line with information-sharing requirements
- additional consideration of vulnerability factors such as SEND, mental health needs, care experience, social isolation, exploitation, county lines, peer-on-peer abuse, online harm, and radicalisation

Where a safeguarding concern relates to an employer, workplace practice, or an adult in a position of trust, KTA will respond in line with safeguarding procedures, including referral to external agencies where appropriate.

KTA will ensure that apprentices aged 16–17 are reminded regularly of the safeguarding support available to them and that they know how to access help both within KTA and externally if required.

## **15. Online Safety**

KTA ensure appropriate filters and appropriate monitoring systems are in place for all students accessing the internet within their study location. KTA understands the importance of online safety training for both staff and students and will ensure that all students undertake online safety training at the start of their programmes.

## **16. Allegations against staff**

The Academy has in place a Code of Conduct Policy for staff which sets out clearly its expectations in terms of staff behaviours and provides staff with information on keeping themselves safe.

Nevertheless, allegations against staff may occur.

It is a criminal offence for a person over the age of 18, in a position of trust, to enter into a sexual relationship with any student under 18 years old, even if the relationship is consensual.

If allegations are made against a member of staff, Personnel must be informed immediately and relevant disciplinary procedures maybe invoked.

[Keeping children safe in education - GOV.UK](#)

Please see Part 4 of the above document. Allegations may refer to behaviour outside the Academy and guidance may be sought from the LADO. Allegations must be reported to the Designated Safeguarding Lead.

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to KTA's procedures to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual. For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made. (taken from KSCIE 2025)

## **17. Disclosure and Barring Service (DBS) Referrals**

The organisation acknowledges its statutory duty under the Safeguarding Vulnerable Groups Act 2006 to make referrals to the Disclosure and Barring Service (DBS) where safeguarding concerns arise. A DBS referral will be made when an individual engaged in regulated activity with children or vulnerable adults has caused harm, posed a risk of harm, or behaved in a manner that raises serious concerns about their suitability to work with vulnerable groups, and as a result has been removed from their role or would have been removed had they not resigned or ceased involvement.

Safeguarding scenarios that may require a DBS referral include, but are not limited to, incidents of sexual, physical, emotional or psychological abuse, neglect, exploitation, or serious breaches of professional boundaries, including abuse of a position of trust. These scenarios apply equally to paid staff, volunteers, contractors, and researchers undertaking regulated activity on behalf of the organisation.

All safeguarding concerns must be reported without delay to the Designated Safeguarding Lead (DSL). The DSL, in consultation with senior management where appropriate, will assess whether the legal threshold for a DBS referral has been met. Referrals will be made promptly and will not be avoided or delayed due to an individual's resignation, withdrawal from duties, or the outcome of internal disciplinary processes.

Where required, safeguarding concerns will also be referred to relevant statutory agencies, including the Local Authority Designated Officer, Adult or Children's Social Care, and the Police. A DBS referral does not replace the responsibility to report to other agencies where there is a risk of harm or a criminal offence may have occurred.

All safeguarding concerns, decisions, and referrals will be fully documented, stored securely, and managed in accordance with data protection legislation. This policy section will be reviewed regularly to ensure continued compliance with safeguarding legislation and statutory guidance.

### **18. Training and Awareness**

All staff will receive annual safeguarding training which is compulsory, including how to identify and respond to concerns which is stipulated in our standardisation meetings, held twice yearly. All staff are required to complete the following units on our staff training platform.

- The Prevent Duty
- Safeguarding children and young people in education
- Mental Wellbeing in Children and Adults
- Health and Safety in Education
- Cyber Security
- Equality and Diversity
- Online Safety

In addition, if you are involved in teaching learners aged 16-18 you will be required to complete the following units.

- Looked after children
- Suicide awareness & prevention
- Understanding anxiety
- Understanding low mood/depression
- Understanding self-harm
- Young Carers

### **19. Review and Monitoring**

This policy will be reviewed annually and updated as necessary. KTA's safeguarding arrangements will be monitored accordingly.

### **20. Legislation and Guidance**

This policy and related procedures are driven by the following legislation and guidance:

- Children Act 1989 /2004
- Education Act 2002 (s175)
- Equality and Diversity Act 2010
- Keeping Children Safe in Education (2025)

- Safeguarding Vulnerable Academies Act 2006
- Working Together to Safeguard Children (2018)
- Safeguarding Children and Safer Recruitment in Education (DfES 2006)
- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (DCSF 2009)
- Safer Practice, Safer Learning (NIACE 2007)
- Academy's - National Minimum Standards (DoH 2002).
- Children's Plan 2007
- DfES Safeguarding Children in Education
- Every Child Matters: Next Steps
- Excellence Gateway – Safeguarding, 2009
- Local Safeguarding Children Board
- NSPCC – Guidance on Child Protection Records
- The Protection of Children in England – the Government Response to Lord Laming, 2009
- Safeguarding children from forced marriages
- Vetting and Barring Scheme – Update. Independent Safeguarding Authority, 2009

## **21. Important Contacts**

FE&HE Prevent Co-ordinators.

The southeast region is being covered by the London co-ordinator Alamgir Sheriyar, 07468 714372  
[alamgit.sheriyar@education.gov.uk](mailto:alamgit.sheriyar@education.gov.uk)

Keeping Children Safe in Education (Latest Guidance);

[Keeping children safe in education - GOV.UK](https://www.gov.uk/guidance/keeping-children-safe-in-education)

*Appendix 1*

**HIGHLY CONFIDENTIAL**

**Summary of Child Protection Allegation/Concern to be  
placed on Personnel File/kept by the Agency**

**Name .....** **Date.....**

**Explanatory statement**

This statement is made in accordance with “Safeguarding Children and Safer Recruitment in Education” DfES 2006, para 5.10, and “Working Together to Safeguard Children” HM Government 2006, Appendix 5, para-9.

There is a requirement to keep a clear and comprehensive summary of allegations, how the allegation was followed up and resolved, and a note of any action taken and decisions reached. This should be kept on an employee’s confidential personnel file, (or in the case of a volunteer, confidentially stored by the agency), and a copy provided to the person concerned.

The purpose of this record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where a future DBS Disclosure reveals information from the police about an allegation that did not result in prosecution or a conviction. It will also prevent unnecessary re- investigation if, as sometimes happens, allegations resurface after a period of time.

This record should be retained at least until you have reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

**Summary of allegation:**

**How Allegation was followed up:**

**Outcome:**

**Action taken and decisions reached:**

**Employee Comments:**

Signed by: Responsible Manager  
.....

LADO .....  
Employee.....

**\*Outcomes:**

**Substantiated** - A substantiated allegation is one which is established by evidence or proof’

**Unsubstantiated** - An unsubstantiated allegation is not the same as a false allegation. It simply means that there is insufficient identifiable evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

**Unfounded** - This indicates that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively they may not have been aware of all the circumstances. For an allegation to be classified as unfounded, it will be necessary to have evidence to disprove the allegation.

Deliberately invented or malicious - This means there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false.

LADO refers to the local authority officer designated to give advice and monitor allegations against adults working with children.